

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

JANE DOES 1-9,

Plaintiffs,

vs.

COLLINS MURPHY, SHARON HAMMONDS, BRENDA F. WATKINS, LIMESTONE UNIVERSITY, MG FREESITES, LTD., d/b/a PORNHUB.COM, MG FREESITES II LTD., MINDGEEK S.A.R.L., MINDGEEK USA, INC., MG BILLING LTD., and HAMMY MEDIA LTD. d/b/a XHAMSTER.COM, TRAFFICSTARS LTD., WISEBITS LTD, XHAMSTER IP HOLDINGS LTD, WISEBITS IP LTD.,

Defendants.

Case No.: 7:20-cv-00947

**MOTION FOR EXTENSION OF TIME
TO FILE REPLY TO RESPONSE IN
OPPOSITION TO TRAFFICSTARS,
LTD'S MOTION TO DISMISS**

The undersigned counsel requests an extension of time in which to file a reply to Plaintiff's Response in Opposition to Trafficstars, LTD's Motion to Dismiss. The current deadline to file Trafficstars, LTD's reply is February 27, 2023. Counsel for Trafficstars, LTD respectfully requests a one-week extension of time to file their reply. Counsel has several other current deadlines that have prevented counsel from finalizing Trafficstars, LTD's reply. If this motion is granted, the new deadline for Trafficstars, LTD's reply would be March 6, 2023. Counsel for Trafficstars, LTD has conferred with opposing counsel and counsel does not have any objection to an extension of time being granted.

Respectfully requested,

s/ Hannah Rogers Metcalfe
Hannah Rogers Metcalfe, Fed. I.D.# 9943
Metcalfe & Atkinson, LLC

1395 South Church Street
Greenville, South Carolina 29605
Telephone: (864) 214-2319
Facsimile: (864) 214-3067
hmetcalfe@malawfirmsc.com

Evan Fray-Witzer (*pro hac vice*)
CIAMPA FRAY-WITZER, LLP
20 Park Plaza, Suite 505
Boston, Massachusetts 02116
Telephone: 617-426-0000
Facsimile: 617-423-4855
Evan@CFWLegal.com

Valentin D. Gurvits (*pro hac vice*)
Frank Scardino (*pro hac vice*)
BOSTON LAW GROUP, PC
825 Beacon Street, Suite 20
Newton Centre, Massachusetts 02459
Telephone: 617-928-1804
Facsimile: 617-928-1802
vgurvits@bostonlawgroup.com
frank@bostonlawgroup.com

Attorneys for Trafficstars, LTD

February 27, 2023
Greenville, South Carolina